

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DONNA CURLING, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**STATE DEFENDANTS' MOTION FOR
LEAVE TO FILE MATTERS UNDER SEAL**

Pursuant to Appendix H, State Defendants move this Court to seal the following exhibits contained in State Defendants' Notice of Filing Sealed Exhibits to the Statement of Undisputed Material Facts at [Doc. 1570]:

1. [Doc. 1570-1] Ex. No. 16: January 19, 2022 Deposition Transcript of Donna Curling;
2. [Doc. 1570-2] Ex. No. 20: March 8, 2022 Deposition Transcript of Donna Price;
3. [Doc. 1570-3] Ex. No. 22: October 19, 2021 Deposition Transcript of Jeffrey Schoenberg;
4. [Doc. 1570-4] Ex. No. 41: MITRE Report;
5. [Doc. 1570-5] Ex. No. 45: December 16, 2022 Deposition of Dr. Phillip B. Stark;
6. [Doc. 1570-6] Ex. No. 56: December 16, 2022 Deposition of Kevin Skoglund;

7. [Doc. 1570-7] Ex. No. 57: November 17, 2021 Deposition of Dr. J. Alex Halderman;
8. [Doc. 1570-8] Ex. No. 58: January 3, 2023 Deposition of Dr. J. Alex Halderman; and
9. [Doc. 1570-9] Ex. No. 60: January 27, 2022 Deposition of Dr. Andrew W. Appel.

State Defendants do not believe these exhibits should be filed under seal. However, State Defendants move this Court to seal these exhibits under an abundance of caution, and due to the belief that Plaintiffs would like these exhibits to be filed under seal.

State Defendants attach a proposed order sealing that filing herewith.

Respectfully submitted this 10th day of January 2023.

/s/ Vincent R. Russo

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L.R. 7.1(D) CERTIFICATION

I certify that this Notice of Filing has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Response has been prepared using 13-pt Century Schoolbook font.

/s/ Vincent R. Russo
Vincent R. Russo